



MEMO ENDORSED

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February 3, 2022

VIA ECF

Honorable Kenneth M. Karas, U.S.D.J.
United States District Court
Southern District of New York
300 Quarropas St.
White Plains, NY 10601

Re: *Le v. Prudential Financial, Inc., et al., 21-cv-7203-KMK (S.D.N.Y)*

Dear Judge Karas:

We represent Defendants Prudential Financial, Inc., Prudential Retirement Insurance and Annuity Company, and Prudential Investment Management Services, LLC (the “Prudential Defendants”).¹

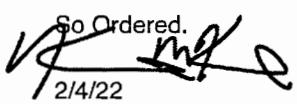
We write on behalf of all parties (including Plaintiff and Defendant Mikimoto (America) Co., Ltd.) to jointly request that Your Honor enter an order staying this case (including staying Defendants’ deadline to respond to the Amended Complaint) so that the parties can pursue either mediation or a settlement conference. The parties further jointly request that all Defendants’ time to respond to the Amended Complaint be extended until fourteen (14) days after the conclusion of a mediation or settlement conference.

The parties seek this relief in good faith, to avoid potentially unnecessary costs and fees, and in furtherance of the discussions which took place before Your Honor during the January 10, 2022 pre-motion conference. If this relief is granted, the parties will provide a status report to the Court by April 4, 2022 as to whether the matter has resolved.

¹ The Complaint also pleads claims against a co-defendant identified as “Prudential Retirement Services.” To the best of the Prudential Defendants’ knowledge, there is no legal entity called simply “Prudential Retirement Services,” nor has such an entity been served. Rather, “Prudential Retirement Services” is a “doing business as” designation.

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Granted, but there will be no more
extensions.

So Ordered.

2/4/22

Respectfully submitted,
SEYFARTH SHAW LLP

/s/ *Jacob Oslick*
Jacob Oslick

Cc: All counsel of record (via ECF and email)